



July 29, 2025

Docket Operations
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: [Docket No. FMCSA–2025–0121] RIN 2126–AC95
Accident Reporting: Modification to the Definition of the Term “Medical Treatment”

Dear Sir or Madam:

National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) on its Accident Reporting: Modification to the Definition of the Term “Medical Treatment”, as published in Volume 90 Number 103, of the Federal Register on May 30, 2025.

About The National School Transportation Association

NSTA has been the leading resource for school transportation solutions and the voice for private school bus operators for over 60 years. We are a membership organization for school bus contract operators engaged primarily in transporting students to and from school and school-related activities. Members range from small family businesses to large multi-state operators. Private school bus contractors account for 38 percent of the nation’s pupil transportation services and employ more than 250,000 individuals such as bus drivers, mechanics, maintenance workers, dispatchers, and administrative workers. School transportation represents the largest form of mass transportation in the United States, and daily, approximately 25 million K-12 students are transported by an estimated 480,000 yellow school buses.

NSTA Supports Clarification of Medical Treatment Definition; Calls for Improved Clarification

NSTA agrees that the revised definition of “medical treatment” proposed in the Notice of Proposed Rulemaking is both appropriate and necessary to more accurately reflect the realities of injury reporting within the Commercial Motor Vehicle (CMV) space. It is our belief that clarifying what constitutes reportable medical treatment, particularly in distinguishing routine or preventative care from treatment from a recordable injury, helps reduce ambiguity and supports consistent safety data collection. While the revision is a step in the right direction, NSTA believes that the execution can also be improved.

NSTA urges the FMCSA to allow for greater transparency in the process of verifying agency data. To strengthen implementation, NSTA proposes that agencies adopt a clearly defined, step-by-step review process that aligns with the application of safety data at every stage. This framework may include, but is not limited to: (1) Initial submission of safety data with standardized documentation requirements; (2) Confirmation of receipt and preliminary review by FMCSA; (3) An opportunity for agencies to correct or clarify discrepancies identified in the review; (4) Publication of verification criteria so stakeholders understand how data is being evaluated; (5) A final certification step that includes sending confirmation back to the reporting agency.

National School Transportation Association

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We believe that outlining these steps will ensure that all jurisdictions follow the same reporting sequence. Additionally, this structured framework would not only promote transparency but also create a uniform recordkeeping method that reduces discrepancies and supports a more reliable nationwide safety dataset.

NSTA also recommends that FMCSA review and refine the procedures by which law-enforcement agencies report qualifying events. Currently, variations in how incidents are documented and transmitted can create notable inconsistencies within the reporting system. NSTA firmly believes that by revising and standardizing reporting procedures, such as defining the essential data elements, establishing uniform timelines for submission, and clarifying thresholds for what constitutes a qualifying event will decrease the frequency of DataQ disputes and challenges.

Greater clarity will not only minimize administrative burdens on carriers and agencies but will also strengthen the integrity of the underlying safety data. Without a clear and uniform reporting standard, inconsistent practices will likely continue across jurisdictions, thus creating inconsistent or mischaracterized data. Left unchecked, this dynamic can ultimately erode confidence in the system and compromise the value of the data FMCSA relies on for oversight and decision-making. We also suggest the implementation of a system, whereby regulated entities can submit a grievance for incorrect “event or incident” reports and be provided a formal and separate adjudication process for the same.

Summary and Conclusion

NSTA recognizes the rationale behind this proposal and supports FMCSA’s efforts to reflect realities of injury reporting within the motor carrier industry. However, NSTA believes that defined methods of verification must be made available to the regulated community. Additionally, procedures by which law enforcement report qualifying events should be refined, or redefined, and that transparency in the agency's methods of data collection and application reflect the rule’s effective and consistent implementation.

NSTA appreciates the opportunity to offer comments on FMCSA–2021–0050, RIN 2126–AC39, and we look forward to a continued dialogue with the Agency in monitoring the results of this proposal.

If you have any questions about our position, or need further clarification on our comments is required, please do not hesitate to contact me via email at cmacysyn@yellowbuses.org, or via telephone at 703-684-3200, ext. 700

Sincerely,

A handwritten signature in black ink, reading "Curt Macysyn", is positioned below the word "Sincerely,".

Curt Macysyn
Executive Director
National School Transportation Association